## Caution: DRAFT FORM

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If you have any comments on this draft form, you can submit them to us on our web site. Include the word DRAFT in your response. You may make comments anonymously, or you may include your name and e-mail address or phone number. We will be unable to respond to all comments due to the high volume we receive. However, we will carefully consider each suggestion. So that we can properly consider your comments, please send them to us within 30 days from the date the draft was posted.

## **SCHEDULE P** (Form 1120-FSC)

Department of the Treasury Internal Revenue Service

## Transfer Price or Commission

For amount reported on line ......, Schedule ...... ..... , Form 1120-FSC.

► See separate instructions. Please type or print.

► Attach Schedule P to Form 1120-FSC

OMB No. 1545-0935

Name as shown on Form 1120-FSC Employer identification number A Product or product line (see back of schedule and instructions) B Basis of reporting (see instructions): 1. Transaction-by-transaction: a. Aggregate on Schedule P C Principal business activity code (if applicable) (see back of schedule and instructions) b. Aggregate on tabular schedule . c. Tabular schedule of transactions . 2. Group of transactions Part I **FSC Profit** Section A—Combined Taxable Income (see instructions) **Full Costing** Foreign trading gross receipts from transaction between FSC or related supplier and third party 1 Costs and expenses allocable to foreign trading gross receipts from transaction: Cost of goods sold attributable to property if sold, or depreciation attributable to property if leased b Related supplier's expenses allocable to foreign trading gross receipts (see 2b 2c FSC's expenses allocable to foreign trading gross receipts 2d Combined taxable income. Subtract line 2d from line 1. If zero or less, enter -0-3 Marginal Costing Foreign trading gross receipts from resale by FSC, or sale by related supplier, to third party Costs and expenses allocable to foreign trading gross receipts from sale: 5a Cost of direct material attributable to property sold . . . . . . . . 5c c Add lines 5a and 5b . . . . . . . . . . . . 6 Subtract line 5c from line 4. If zero or less, skip lines 7 through 11 and enter -0- on line 12 Gross receipts of related supplier and FSC or controlled group from foreign and domestic sales of the product Costs and expenses of related supplier and FSC or controlled group allocable to gross income from sales: Add lines 8a and 8b . . . Subtract line 8c from line 7. If zero or less, skip lines 10 and 11 and enter -0- on line 12 9 % 10 10 Overall profit percentage. Divide line 9 by line 7. Check if the controlled group optional method is used.  $\blacktriangleright$ 11 11 12 Combined taxable income. Enter the smaller of line 6 or line 11 12 Section B—23% of Combined Taxable Income Method (see instructions) 13 13 FSC profit. Enter amount from line 13. If marginal costing is used, enter the smaller of line 3 or line 13. 14 Section C—1.83% of Foreign Trading Gross Receipts Method (see instructions) 15 15 16 Multiply line 3 or line 12 (as elected by related supplier) by 46% . . . . . 16 FSC profit. Enter the smallest of line 3, line 15, or line 16 17 Part II Transfer Price From Related Supplier to FSC 18 Enter amount from line 1 or line 4, whichever is applicable . . . 19a FSC profit. Enter amount from line 14 or line 17, whichever is applicable . FSC expenses allocable to foreign trading gross receipts from transaction 19c Transfer price from related supplier to FSC. Subtract line 19c from line 18 (see instructions) 20 **FSC Commission From Related Supplier** Part III 21 FSC profit. Enter amount from line 14 or line 17, whichever is applicable . FSC expenses allocable to foreign trading gross receipts from transaction. . . 22 22 FSC commission from related supplier. Add lines 21 and 22 (see instructions), 23